



March 10, 2011

*via email and U.S. mail*

United States Environmental Protection Agency  
Region V  
RCRA Enforcement Branch (HRE-8J)  
77 Jackson Street  
Chicago, IL 60604  
Attention: Carolyn Bury, Project Coordinator

Subject: Administrative Order  
Docket No. V-W-89R-45  
Arkema Inc.  
Riverview, Michigan  
MID 005 363114  
Progress Report #126

Dear Ms. Bury:

In accordance with Task IV, Subtask B of Attachment IV to the above-referenced Administrative Consent Order (ACO), this letter will serve as the Bi-monthly Progress Report covering corrective action activities for the East Plant during the period of January and February 2011. A bi-monthly progress report for activities at the West Plant and West Brine Field will be submitted under separate cover by Mr. Bob Wright of Arkema Inc. (Arkema).

This report describes progress during the reporting period towards fulfilling the requirements of the ACO. A description of the activities anticipated for March and April 2011 is also included.

**I. East Plant Activities Completed in January and February 2011**

**CMS Task IV**

The CMS is currently under review by USEPA.

### Interim Remedial Measures

Operation of the Halowax groundwater containment system continued. All discharge was within POTW permit limitations.

Since pumping began in 2001, 900,810 gallons of groundwater have been extracted and treated by the Halowax Area treatment system and approximately 385 gallons of DNAPL have been recovered. A total of 12,880 gallons were extracted and treated during the reporting period. During the reporting period it was discovered that the recovery wells are fouled and redevelopment is necessary to restore pumping rates.

### Other Activities

Work on the Great Lakes Legacy Act Trenton Channel investigation and FS continued. Compilation of existing data began and work plans for several tasks were.

## **II. Corrective Action Activities Anticipated for March and April 2011**

### CMS Task IV

None.

### Interim Remedial Measures

Operation and maintenance of the Halowax groundwater containment system will continue. Redevelopment of the recovery wells will be performed in March.

### Other Activities

Work on the Great Lakes Legacy Act Trenton Channel investigation and FS project will continue. Hydrographic survey activities will begin in March, weather permitting. A public meeting is tentatively scheduled for April 14.

Based on the above information, LSS believes that all project activities during the reporting period were in full compliance with the requirements of ACO. If you have any questions or comments regarding this information, please call me at (610) 594-4435.

Sincerely,



Michael Pinto  
Principal Environmental Engineer  
Legacy Site Services, LLC

cc: Mr. Peter Quackenbush- MDNR - Waste Management Div. Lansing  
Mr. Lawrence Aubuchon- MDNR - Waste Management Div. Livonia